

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA – NORTHERN DIVISION**

TESORO REFINING & MARKETING  
COMPANY LLC, a Delaware limited liability  
company,

Plaintiff,

v.

ALANDDON LLC, a Nevada limited liability  
company; KIM FIEGEHEN, as Guardian ad  
Litem for DONALD A. LEHR, individually;  
VALARIE M. LEHR, individually; and KIM  
FIEGEHEN, as Guardian ad Litem, for ALLAN  
G. FIEGEHEN, individually.

Defendants.

CASE NO.: 3:19-cv-00449-LRH-WGC

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
RESPONSE TO DEFENDANT’S MOTION  
FOR PARTIAL SUMMARY JUDGMENT  
(ECF No. 46) – SECOND REQUEST**

Plaintiff TESORO REFINING & MARKETING COMPANY LLC (“Tesoro”), by and through its attorneys of record, Griffith Hayes, Esq. of the law firm of LITCHFIELD CAVO LLP, and ALANDDON LLC, VALARIE M. LEHR, and KIM FIEGEHEN, as Guardian Ad Litem, for ALLAN G. FIEGEHEN and DONALD A. LEHR (collectively referred to as “Defendants”) by and through their counsel of record, Ryan Russell, Esq. of the law firm of ALLISON MACKENZIE, LTD.,

do hereby stipulate and agree as follows:

1. Plaintiff filed its first amended complaint on November 15, 2019 (ECF No. 17).
2. Defendants filed their answer to the amended complaint on May 29, 2020 (ECF 32).
3. The current deadlines, pursuant to the stipulated discovery plan and scheduling order – fourth request are: Discovery Cut-Off – June 14, 2021; Amend the pleading or add parties – February 26, 2021; Initial Expert Disclosure: February 14, 2021; Rebuttal Expert Disclosure: March 15, 2021; Dispositive Motion Deadline: July 19, 2021 and Joint Pre-Trial Order: June 29, 2021.
4. On December 23, 2020, Defendants filed their Motion for Partial Summary Judgment on Plaintiff’s Second Claim for Relief (Breach of Contract against Guarantors)(the “MPSJ”)(ECF No. 46).
5. Plaintiff’s response to Defendants MPSJ is March 31, 2021 pursuant to Court Order (ECF No. 53).
6. On January 19, 2021, Defendants filed their Motion for Protective Order that Allan G. Fiegehen Not Be Deposed (ECF No. 50) and Motion for Protective Order that Donald Lehr Not Be Deposed (ECF No. 51) (the “Motions for Protective Orders”).
7. Plaintiff’s filed its response to the Defendants’ Motions for Protective Orders ECF No. 50 and ECF No. 51 on March 16, 2021.
8. Defendant’s filed their Reply in Support Motions for Protective Orders on March 23, 2021. (ECF 64 and 65).
9. The hearing for Motions for Protective Orders is set for April 15, 2021.
10. Defendant’s counsel agreed that Plaintiff’s response to Defendant’s MPSJ (ECF No. 46) shall be not be due until after the Motions for Protective Orders (ECF Nos. 50 and 51) have been ruled on. Both counsel agreed that Plaintiff’s response to the Defendant’s MPSJ will be due April 19, 2021.
11. This is Plaintiff’s second request for an extension in regard to Defendant’s MPSJ (ECF No. 46).

**IT IS SO STIPULATED.**

1 Dated: March 31, 2021

**LITCHFIELD CAVO LLP**

2 By: /s/ Griffith H. Hayes, Esq.  
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12 Attorneys for Plaintiff


8 Dated: March 31, 2021

**ALLISON MacKENZIE, LTD.**

9 By: /s/ Ryan Russell, Esq.  
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16 Attorneys for Defendants

14 **IT IS SO ORDERED** that the deadline for Plaintiff to file its response to Defendant's MPSJ  
15 (ECF No 46) is April 19, 2021.

17 DATED this 1st day of April, 2021.

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19 LARRY R. HICKS  
20 UNITED STATES DISTRICT JUDGE  
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